

ORIGINAL

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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MAILING ONLINE SERVICE

Docket No. MC98-1

RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS GARVEY TO INTERROGATORIES OF  
THE OFFICE OF THE CONSUMER ADVOCATE  
(OCA/USPS-T1-43-44)

The United States Postal Service hereby provides the responses of witness Garvey to the following interrogatories of the Office of the Consumer Advocate: OCA/USPS-T1-43-44, filed on October 9, 1998.

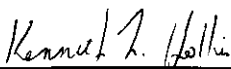
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
\_\_\_\_\_  
Kenneth N. Hollies

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October 19, 1998



RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS GARVEY  
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OCA/USPS-T1-43. Please refer to Tr. 4/843. Here you refer to a "new version of the [Mailing Online] system due to be implemented for the market test . . . ."

- a. Has this new version been implemented? If not, what is the expected date of implementation?
- b. Does this new system record data in sufficient detail to permit creation of tabulations of AP volumes by job type by page count by presort discount qualification? If so, please provide such tabulations for each available AP.
- c. Can data from the new system be merged with data from some other system (e.g., mailing statements or sortation software reports) so as to generate the tabulations requested in part b. of this interrogatory? If so, please provide such tabulations for each available AP.
- d. Can the tabulations requested in parts b. and c. of this interrogatory be generated for periods other than APs? If so, please provide such tabulations for each available period.

RESPONSE:

- a. As of this date, the new version has not been implemented for customer use. Pending successful completion of systems testing, the new version will be implemented on October 22, 1998 concurrent with the launch of the new version of the PostOffice Online system.
- b-d. From a technical perspective, data recordation and tabulation capabilities are virtually unchanged from those available during the operations test, although the Postal Service does anticipate being able to provide data in keeping with the Commission's Opinion regarding a market test for Mailing Online. Currently, association of presort qualification with job type characteristics can be accomplished only through the manual matching of mailing statements with batch job reports. See Tr. 4/845. Since no data yet exist for the market test, reporting it at this time is problematic.

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OCA/USPS-T1-44. Please refer to Tr. 4/845. Here you state that "it would be possible to modify the system so as to store and forward the reports [generated by the sortation software in Mailing Online] . . . ."

- a. Has such a modification been performed? If not, what is the expected date of modification?
- b. What is the name of the sortation software utilized in Mailing Online? Please provide a copy of any instruction manuals, documentation, readme files, or online help files that accompany the sortation software.
- c. Do commercial mailers or presort bureaus use the same sortation software? Do such other users maintain electronic records of the manifests, 3600s, and 3602s generated by the sortation software? If so, what prevents the Postal Service from doing the same?
- d. Can the sortation software used in Mailing Online generate a report that shows the volumes for each manifest, 3600, or 3602 that would qualify for each presort discount? (See PRC Op. MC98-1, October 7, 1998, at 45: "If the mailing statements provide the level of sort achieved on each batch . . . , then the provision of these statements will be sufficient.") If so, please provide all such existing reports and all future reports on an ongoing basis (electronic and hard copy). If not, please "find an alternative means of providing the depth of sort data for each batch." *Id.*
- e. Can any of the manifests, 3600s, or 3602s generated by the sortation software be associated with a particular page count/job type category. For example, do the reports or mailing statements generated by the sortation software contain an identification code that can be associated with an identification code in the job type/page count reports generated by the system software? If so, please provide the tabulations requested in OCA/USPS-T1-43.

RESPONSE:

- a. No system modification has been performed which would allow the storing and forwarding of sortation software reports. Although no firm timeline has been established, a ready means of providing this information has been identified in the form of a built-in switch in the commercial software which allows the creation of a "Mail.dat" file for each batch file statement. The Mail.dat file contains all of the variable elements of a mailing statement and allows for storage and manipulation of the data in soft-copy

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format. We are currently analyzing the time and effort requirements of a modification to allow the creation and electronic forwarding of "Mail.dat" files for all MOL statements.

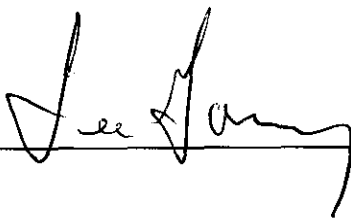
- b. The sortation software utilized is Postalsoft's "Presort Jobfile".  
  
Documentation supplied with the software is the property of the Firstlogic – Postalsoft company and cannot be released or reproduced without their express permission. The company declined to authorize inclusion of the documentation in this response but did indicate a willingness to discuss the possibility of sharing it with participating parties on a one-to-one basis. Counsel can provide contact information upon request.
- c. According to Postalsoft, Presort Jobfile is used by a variety of commercial mailers, presumably including presort bureaus. Also, according to Postalsoft, electronic records (Mail.dat files) can be generated by Presort Jobfile and such reports could be (and may be) generated and maintained by other users. The existing MOL system configuration and settings prevent the Postal Service from generating and storing mail.dat files.
- d. The MOL system as currently configured does not generate or keep those records, nor can any reports other than mailing statements be generated; as indicated above, a system modification to enable a Mail.dat reporting option is currently being investigated.
- e. Currently, mailing statements generated by Presort Jobfile do not contain any identification which would allow them to be associated either with a

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particular batch number or the job type/page count reports generated by  
the system. We intend to investigate such an option in the near future.

## DECLARATION

I, Lee Garvey, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

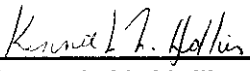


A handwritten signature, appearing to read "Lee Garvey", is written over a horizontal line.

Dated: 10/19/98

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

  
\_\_\_\_\_  
Kenneth N. Hollies

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